

SEP 05 1995

**RCRA PERMITS SECTION**

Recycling Solutions for Every Environment

WA 2917  
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9/1/1995

September 1, 1995

Certified Mail

Mr. Galen Tritt  
Washington Department of Ecology, Northwest Regional Office  
3190 160th Avenue S E  
Bellevue, WA 98008-5452

Re: **Submittal of Permit Modification PRMOD8-2**

Dear Mr. Tritt:

Enclosed is a class 2 permit modification request for the Burlington Environmental Inc. (dba Philip Environmental) **Pier 91 Facility**. This modification provides an update of the facility closure plan. A copy of the revised plan is attached for your files.

As you know, Burlington has ceased operations at the Pier 91 Facility. The majority of the units at the facility have been closed under the approved interim status closure plan, but a few units remain to be closed under the Part B closure plan. Instead of modifying the entire permit and attachments to reflect current conditions, Burlington is updating the Part B closure plan to describe closure of only those existing units that were not addressed by the interim status closure plan, and to remove references to the numerous planned units described in the original permit application that were never constructed.

Several key changes to the Part B closure plan are readily apparent:

- The proposed units that were never constructed have been deleted from this plan (e.g., temporary container storage pad, upgraded tanks);
- The remaining tank to be closed under the Part B is Tank 164 (which was identified in the Part B permit application as Tank 2313);
- As with the interim status plan, the revised closure plan addresses decontamination of above-ground units (i.e., tanks and the top surface of concrete secondary containment systems). Soil, groundwater, and concrete structures will be addressed under ongoing RCRA corrective action mechanisms.
- The centrifuge identified in the Part B was never placed in dangerous waste service, and has been deleted from this plan;

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- The use of alternative treatment technologies for hazardous debris has been included as an option for verifying decontamination of tanks and secondary containment structures.

A brief description of the timeline for closure follows:

- Tank 164, the remaining dangerous waste tank, was decontaminated and removed from the facility on July 19, 1995. This action should have triggered the closure notification requirements of WAC 173-303-610(3)(c)(i). Accordingly, Burlington should have notified Ecology on July 5, 1995, of our intent to begin final closure procedures at the facility. This notification was provided on August 16, 1995.
- For purposes of determining time allowed for closure, July 19, 1995 is considered the date the final volume of waste was received. Removal of all dangerous waste was completed on this date (within the 90 days allowed by WAC 173-303-610(4)(a). Completion of closure is expected within the 180 days allowed by WAC 173-303-610(4)(b).
- WAC 173-303-610(3)(b) indicates that amendments to the closure plan should be submitted for approval 60 days prior to the proposed change in facility operations. Due to uncertainty regarding the long-range plans for the Pier 91 Facility, Burlington was unable to provide an advance submittal, and requests an extension to the timeline specified in this requirement.

As we discussed in our recent telephone conversation, Ecology will notify Burlington as to when the public notice of this modification is to be made. Thank you for your attention to this matter, and please call me at (206) 227-7527 if you have any questions.

Sincerely,



Keith Lund  
Senior Environmental Compliance Specialist

Enclosures

cc: Dave Bartus, EPA Region 10

Gerald Lenssen, Ecology HQ



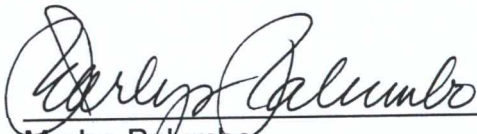
September 1, 1995

Part B Permit Modification  
PRMOD8-2

As required by WAC 173-303-810(12) and (13), Burlington Environmental Inc. (dba Philip Environmental) is providing the following certification statement for permit modification request PRMOD8-2 for the Pier 91 Facility. If you have any questions regarding this matter, please contact Keith Lund at (206) 227-7527.

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Marlys Palumbo  
Vice President and Corporate Counsel

9/1/95  
Date

**Pier 91 Facility Part B Permit Modification**

**Title:** Update of Closure Plan

**Modification Number:** PRMOD8-2

**Submitted:** September 1, 1995

**Summary Description:**

This modification revises the Pier 91 Facility closure plan to reflect current conditions at the facility.

**Modification Class:**

Although not specifically identified in WAC 173-303-830 Appendix I, Ecology has requested that this submittal be considered a Class 2 permit modification.

**Detailed Description:**

See revised Closure Plan (attached).

**Backup Technical Documents:**

Not applicable.

**List of Affected Sections:**

Attachment HH (Section I of the permit application), the Closure Plan, has been revised throughout. A revised copy is attached.

**Public Notice Information:**

Because the revised closure plan may require subsequent revisions based on Ecology's comments, a public notice will not be sent out within seven days of this submittal. Ecology will notify Burlington when to implement the public notice requirements of WAC 173-303-830(4)(b)(ii) for this modification.